UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF TEXAS
DALLAS DIVISION

SUSAN CHANG, as Next Friend of Alison Chang, a minor, And Justin Ho-Wee Wong Plaintiffs, v. Virgin Mobile Pty Ltd., Defendant.	§ § § § § § § § § § § § §	CAUSE NO. 3:07-CV-01767

UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT'S MOTION TO DISMISS

Plaintiffs file this Motion for Continuance, respectfully requesting that the Court extend the deadline to file their response to Defendant's Motion to Dismiss for a period of 90 days until April 10, 2008.

Plaintiffs respectfully request this continuance so that they may have sufficient time to conduct jurisdictional discovery and acquire evidence to substantiate the basis for filing suit in this Court . Discovery—including but not limited to requests for production, interrogatories, requests for admission and the deposition of corporate representatives having knowledge of the relationship between Defendant and its parent companies, Singtel Optus and Singtel Group—will enable Plaintiffs to establish, among other things, that Defendant has the contacts necessary to subject it to personal jurisdiction in this Court.

Upon the Court's approval, Plaintiffs will schedule and conduct the relevant jurisdictional discovery at a time mutually convenient to both parties. This continuance is not sought for delay only, but so that justice may be done.

CONCLUSION

For these reasons, Plaintiffs respectfully request that the Court extend their deadline to respond to Defendant's Motion to Dismiss for a period of 90 days until April 10, 2008.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I certify, pursuant to Local Rule 7.1, that I conferred with Lisa Meyerhoff, counsel for Defendant Virgin Mobile Pty, Ltd. on December 28, 2007 and that she consented to Plaintiff's Motion to Extend the Deadline to respond to its Motion to Dismiss.

/s/ Ryan H. Zehl__________
Ryan H. Zehl

CERTIFICATE OF SERVICE

I hereby certify that on the 2 day of January 2008, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. The system sent a "Notice of Electronic Filing" to the following attorneys of record, all of whom have consented to accept this Notice as service of the document:

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/s/ Ryan H. Zehl______________________
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